Julia E. Markley, OSB No. 000791 JMarkley@perkinscoie.com Bryan D. Beel, OSB No. 073408 BBeel@perkinscoie.com PERKINS COIE LLP 1120 N.W. Couch Street, Tenth Floor Portland, OR 97209-4128 Telephone: 503 727 2000

Telephone: 503.727.2000 Facsimile: 503.727.2222

Attorneys for Defendant Runwayfinder, LLC

UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

STENBOCK & EVERSON, an Oregon corporation,

Plaintiff,

V.

RUNWAYFINDER, LLC, dba Runwayfinder.com,

Defendant.

No. CV 10-1475 BR

MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 12 (b)(2) and (3)

By Defendant Runwayfinder, LLC

ORAL ARGUMENT REQUESTED

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(3), defendant Runwayfinder, LLC ("Runwayfinder") moves to dismiss the Complaint of plaintiff Stenbock & Everson because the Court lacks personal jurisdiction over Runwayfinder and because this Court is not an appropriate venue for an action between the parties. Runwayfinder's motion is supported by its separately filed Memorandum and the Declaration of David Parsons. Under LR 7-1, Runwayfinder certifies that the parties made a good faith effort through a telephone conference to resolve this dispute but were unable to do so.

1- RUNWAYFINDER'S MOTION TO DISMISS

Perkins Coie LLP 1120 N.W. Couch Street, Tenth Floor Portland, OR 97209-4128 Phone: 503.727.2000

Fax: 503.727.2222

DATED: February 1, 2011 PERKINS COIE LLP

By: s/Julia E. Markley

Julia E. Markley, OSB No. 000791 JMarkley@perkinscoie.com Bryan D. Beel, OSB No. 073408

BBeel@perkinscoie.com

1120 N.W. Couch Street, Tenth Floor

Portland, OR 97209-4128 Telephone: 503.727.2000 Facsimile: 503.727.2222

Attorneys for Defendant Runwayfinder, LLC

Fax: 503.727.2222